



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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DALLAS, TX 75202-2733

November 14, 2012

UPS

Mr. David Keith
Project Coordinator
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39654

RE: Draft Final Remedial Alternatives Memorandum
San Jacinto River Waste Pits Superfund Site, Harris County, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document dated September 2012. The EPA approves this document with the following modifications:

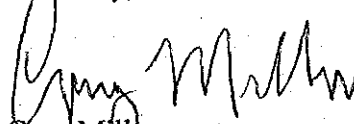
1. **General:** The memorandum shall include a discussion of the highly contaminated waste pit material as principle threat waste.
2. **(Section 1.2.1, p. 2):** The memorandum shall include a figure, or modify an existing figure, to show the stabilized area within the Western Cell. The text shall also describe the depth of the stabilized area. In addition, the Removal Action Completion Report shall be referenced as the final report by EPA (and on p. 108).
3. **(Section 3.1, p. 32):** The reference "USEPA 2002" was not found in the reference list; this reference shall either be added to the list or removed from the text.
4. **(Section 3.2, p. 33):** The text "... and implementation of the TCRA at the Site has eliminated the potential secondary transport mechanisms ..." shall be changed to "... and implementation of the TCRA at the Site has eliminated in the near term the potential secondary transport mechanisms ..." Also, the sentence "Therefore, as a result of the TCRA, RAO 1 has been achieved for the northern impoundments" shall be deleted; the Record of Decision will select the final remedy for the Site.
5. **(Section 4, p. 42 and other pages with similar statements):** The memorandum states that the General Response Actions apply to sediment. The soils (defined as Soil Area 3, Section 2.3.3.1, for example) within the TCRA may also require response actions; the text shall be changed to apply to sediment and soil for general statements of this nature that occur in this section and in other parts of the memorandum, unless the discussion is specifically regarding sediment, as in sediment in the river, for example.

6. **(Table 4-2, p. 49 and other pages with similar statements):** Under the "TCRA" sediment management area, the sentence "Assessing the contaminated material for removal or treatment options would require the removal of all construction elements associated with the TCRA" shall be changed to "Assessing the contaminated material for removal or treatment options may require the removal of some of the construction elements associated with the TCRA, depending on the scope of the removal or treatment" in this section and for similar statements in other parts of the memorandum .
7. **(Section 4.3, p. 50):** The memorandum states that remedial alternatives will include removal, along with no further action and institutional controls. Treatment shall also be added to this list, and shall apply to sediment and soil.
8. **(Section 4.3, p. 51):** The statement that groundwater is unlikely to a significant exposure pathway shall be deleted. The risk assessment will determine the risk from the exposure pathways at the Site.
9. **(Table 4.3, p. 53 and other screening summary tables):** The tables shall be expanded to include a separate summary for the sediment and soil areas at the site.
10. **(Section 4.4.3, p. 59):** This section discussed in-situ containment (capping). However, it does not discuss containment or capping of the TCRA as an alternative. The memorandum shall also include a discussion of containment of the TCRA as an alternative.
11. **(Section 4.4.4.1, p. 67):** This section discusses solidification/stabilization, and states that it would be limited to cases where a relatively dry application could be employed, such as for intertidal sediment. The areas where this could be employed shall also list the TCRA area as well as intertidal sediment.
12. **(Section 4.5.3.3, p. 97):** The disposal of contaminated sediments and soils containing less than the 664 ng/kg TEQ_{DF} in an uncontrolled industrial site in general is not appropriate. However, disposal at a particular site with appropriate controls may be appropriate.
13. **(Table 4-11, p. 100):** This table on costs for process options shall also include the costs for dry excavation.
14. **(Section 5, p. 102):** The sentence "The discussion developed in this section is focused largely on sediment because, as previously discussed, both soil and groundwater media alternatives are limited to no further action and institutional controls at this time" shall be deleted. The memorandum shall include alternatives for soil (containment, solidification/stabilization, removal, partial removal, etc.).
15. **(Section 5.1.3, p. 104):** The text states that the core locations are shown on Figures 5-2 through 5-4. The figures show the locations, but do not have a legend to identify what they are; the figures shall indentify the core locations with an entry in the legend.

16. **(Section 5.1.4.1, p. 108):** This section shall also include a discussion of a partial removal of the TCRA area to address the most highly contaminated portions (i.e., principle threat waste).
17. **(Section 5.1.4.2, p. 110):** This section shall also include a discussion of a partial treatment (solidification/stabilization) of the TCRA area to address the most highly contaminated portions (i.e., principle threat wastes).
18. **(Section 5.2, p. 114):** This section describes the preliminary remedial alternatives. This section shall also include a partial removal and a partial treatment of the TCRA area. In addition, Table 5-6: "Summary of Alternative Volumes and Areas" shall be revised accordingly.
19. **(Section 5.2.2, p. 115):** The "all or nothing" statement regarding removal of the TCRA shall be deleted. While removal all of the TCRA is an alternative, removal (and/or treatment) of a portion of the TCRA is also an alternative.
20. **(Section 6.2, p. 125):** The memorandum states that to achieve background conditions, another 10% reduction in the post-TCRA surface weighted average concentration (SWAC) would be required. The post-TCRA SWAC is given as 12.5 ng/kg TEQ_{DF}. If that is reduced by 10%, then the SWAC would be 11.25 ng/kg TEQ_{DF}; however, the background range is given as 1.0 to 6.54 ng/kg TEQ_{DF}. The memorandum shall clarify this discrepancy.

Please provide copies of the final document to the distribution list. Please contact me at (214) 665-8318, or by email at miller.garyg@epa.gov if there are any questions or comments.

Sincerely,



Gary Miller
Remedial Project Manager

cc: Luda Voskov (TCEQ)
Bob Allen (Harris County)
Linda Henry (Port of Houston)
Jessica White (NOAA)